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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF WYOMING**

UNITED STATES OF AMERICA,	)	
	)	Criminal No. 23-CR-95-SWS
Plaintiff,	)	
	)	
v.	)	
	)	
PETER SZANTO,	)	
	)	
Defendant.	)	

**DEFENDANT'S NOTICE OF  
INTENT TO OFFER EXPERT TESTIMONY**

COMES NOW, Defendant Peter Szanto, by and through his attorney, Keith R. Nachbar, Keith R. Nachbar, P.C. and submits his notice of intent to offer expert testimony, pursuant to Fed.R.Crim.P. 16(b)(1)(C), at the time of trial in the above-entitled matter as follows:

1. **David Hulshizer, MPA, CCFE  
P.O. Box 2844  
Casper, WY 82602  
(307) 472-4619**

## **Qualifications**

Mr. Hulshizer is an experienced certified forensic examiner. His Curriculum Vitae is attached and marked as Exhibit A. He has testified in numerous criminal matters and done imaging, data recovery, and analysis of approximately 500 digital devices. He has been involved in over 200 cases involving the collection of digital evidence and has been designated as an expert witness in Wyoming state courts in Natrona, Sublette, Campbell, and Laramie counties.

## **Basis of Opinions**

Mr. Hulshizer has examined the electronic records, forensic materials, and FBI investigative reports provided by the government in this case and is expected to testify to his examination of those materials and the reasonable conclusions reached based on the data reviewed by the government.

## **Summary of Testimony/Opinions**

Mr. Hulshizer is expected to testify to the limitations of the information obtained and reviewed by the United States in this case. Specifically, it will be Mr. Hulshizer's opinion that several of the conclusions drawn by Agent Fritz regarding the electronic evidence are not supported by the data she received and reviewed. Mr. Hulshizer will explain the deficiencies in the agent's conclusions based on the

information she obtained and reviewed. Mr. Hulshizer may offer opinions on the standard practices of investigators in gathering evidence of a crime through digital data and the deficiencies in the processes used in this case.

Mr. Hulshizer may offer opinions on the IP address information reviewed by the agents in this case, and the reasonable conclusions that can be drawn from that information. He may testify to the deficiencies in the conclusions drawn by the investigating agents regarding the IP addresses.

Mr. Hulshizer may testify regarding all other digital evidence and the improper assumptions and unsupported conclusions drawn by the investigators in this case based on that digital data.

Mr. Hulshizer may testify to any and all opinions he reaches based on additional data and discovery received from the United States or other sources up to the date of trial. Mr. Hulshizer will further testify to rebut any expert opinions offered by any government expert at trial, and to all other matters within his knowledge and expertise.

**RESPECTFULLY SUBMITTED** this 2<sup>nd</sup> day of February, 2024.

Peter Szanto, Defendant

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/s/

Keith R. Nachbar

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